UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ALEJANDRO MORALES, EDUARDO ARAGON, ALEX SANTIAGO, JORGE ALVAREZ VILCHIS, and FIDEL CANTU ORTEGA, individually and on behalf of others similarly situated,

17-cv-02688

Notice of Motion and Motion for Default

Plaintiff,

-against-

BULEE CAFÉ LTD. (d/b/a SARAH'S ARTISANAL KITCHEN), YONG WON BU, and JOHN DOE LEE,

Defendants.

NOTICE OF MOTION

Please take notice that, upon the annexed declaration of Marisol Santos, and attached exhibits, including the declaration of Plaintiffs Alejandro Morales, Eduardo Aragon, Alex Santiago, Jorge Alvarez Vilchis, and Fidel Cantu Ortegega, and all prior papers and proceedings in this case, the Plaintiff, by counsel, will move the court, at such time and date as the Court may designate, pursuant to Fed. R. Civ. P. 55(b) (2) and Local Rule 55.2(b), for judgment by default against Defendants Bulee Café Ltd., and Yong Won Bu.

Answering papers, if any, shall be served on the undersigned no later than fourteen days after service of the moving papers in accordance with Local Rule 6.1(b), or at such other time as the court may direct.

Dated: New York, New York August 17, 2017

MICHAEL FAILLACE & ASSOCIATES, P.C.

By: /s/ Marisol Santos
Marisol Santos
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Attorneys for Plaintiff

To:

BULEE CAFE, LTD. (d/b/a SARAH'S ARTISANAL KITCHEN)

270 Madison Avenue New York, New York 10016

YONG WON BU 270 Madison Avenue New York, New York 10016